UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LEON D. BOROCHOFF, On Behalf of Himself and All Others Similarly Situated,

Plaintiff,

VS.

GLAXOSMITHKLINE PLC, et al.,

Defendants.

Civil Action No. 1:07-cv-05574-LLS

CLASS ACTION

NOTICE OF MOTION AND MOTION TO ADMIT COUNSEL, RAMZI ABADOU, $PROHAC\ VICE$

100 A

(1377F)

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed hereto, we will move this Court before the Honorable Louis L. Stanton at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of Ramzi Abadou, an associate of the firm Coughlin Stoia Geller Rudman & Robbins LLP and a member in good standing of the bar of the State of California, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against applicant in any state or federal court.

DATED: September _____, 2007

COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP SAMUEL H. RUDMAN DAVID A. ROSENFELD

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COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP DARREN J. ROBBINS RAMZI ABADOU 655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax)

[Proposed] Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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AFFIDAVIT OF SAMUEL H. RUDMAN IN SUPPORT OF MOTION TO ADMIT COUNSEL, RAMZI ABADOU, *PRO HAC VICE*

State of New York)
)
County of Melville)

- I, Samuel H. Rudman, hereby affirms as follows:
- 1. I am an attorney duly admitted to practice before the courts of the State of New York and before the United States District Court for the Southern District of New York, among others, I am a member of the law firm Coughlin Stoia Geller Rudman & Robbins LLP, counsel for proposed lead plaintiff in this action. I submit this affirmation in support of the Motion to Admit Counsel, Ramzi Abadou, *Pro Hac Vice* in the above-captioned matter.
- 2. Ramzi Abadou, of the San Diego office of Coughlin Stoia Geller Rudman & Robbins LLP is a member of the bar in good standing in every jurisdiction where he has been admitted to practice. Annexed hereto is a copy of Ramzi Abadou's certificate of standing from the State Bar of California.
- 3. There are no pending disciplinary proceedings against Ramzi Abadou in any state or federal court.
- 4. Ramzi Abadou has read and is familiar with the Local Rules of the United States

 District Court for the Southern District of New York.

	5.	Wherefore	your	affiant	respectfully	submits	that	Ramzi	Abadou	be	permitted	l to
appear	as cour	sel and adv	ocate	pro had	c vice in thes	e related	actio	ons.				

SAMUEL H. RUDMAN

State of New York)

County of New York)

Subscribed and sworn to before me, this <u>21</u> day of <u>September</u>, 2007.

NOTARY PUBLIC

KELLY A. STADELMANN
Notary Public, State Of New York
No. 01ST8047260
Qualified In Nassau County
Cammission Expires August 28, 2010

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

September 13, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, RAMZI ABADOU, #222567 was admitted to the practice of law in this state by the Supreme Court of California on December 4, 2002; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert

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Custodian of Membership Records

CERTIFICATE OF SERVICE

I, Kelly Stadelmann, hereby certify that on September 21, 2007, I caused a true and correct copy of the attached:

NOTICE OF MOTION FOR MOTION TO ADMIT COUNSEL, RAMZI ABADOU, $PRO\ HAC\ VICE\ AND\ SUPPORTING\ PAPERS$

to be served via United States mail on all counsel listed on the attached service list.

Kelly Stadelmann

GLAXOSMITHKLINE 07 Service List - 9/12/2007 (07-0160) Page 1 of 1

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